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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)

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Amendment of Section 73.202(b),
Table of Allotments
FM Broadcast Stations
(Bolingbroke and Yatesville,
Georgia)

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)
)
)
)
MM Docket No. _____
RM 8622

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

TO: The Commission

DOCKET FILE COPY ORIGINAL

**APPLICATION FOR REVIEW OF ACTION
TAKEN BY MASS MEDIA BUREAU**

Joseph J. Kendrick ("Petitioner"), permittee of radio station WDBS(FM), Bolingbroke, Georgia, pursuant to 47 C.F.R. §1.115, hereby requests the Commission to reverse the May 17, 1995 action of the Mass Media Bureau, per Chief, Allocations Branch, Policy and Rules Division, returning as unacceptable for consideration a Petition for Rulemaking filed March 8, 1995. A copy of the letter taking this action is attached hereto as Exhibit A.

In support whereof, the following is shown:

I. Introduction

In his Petition for Rulemaking and Modification of Construction Permit filed March 8, 1995, Petitioner requested modification of the FM Table of Allotments to delete Class A Channel 271 from Bolingbroke, Georgia, and assigning it to Yatesville, Georgia, for use by Station WDBS as a Class C3 channel. Such changes are authorized by 47 C.F.R. §1.420(i). See Modification of FM and TV Authorizations to Specify a New Community of License

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("Modification of Community"), 4 FCC Rcd 7094 (1990), Recon. granted in part ("Recon. Order"), 5 FCC Rcd 7094 (1990). The Bureau, however, ruled that since Petitioner had received his permit as the result of a comparative hearing in which he received qualitative enhancements for local residence and limited civic activities under the then applicable integration criterion,^{1/} his petition was not acceptable under Modification of Community, supra. Exhibit A. The Bureau also noted that Petitioner's proposal would deprive Bolingbroke of its only local service, but did not specifically hold that this factor required dismissal of the petition. Id.

II. Questions Presented for Review

Petitioner submits that the Bureau's action raises the following questions which require review by the full Commission:

- A. Whether the Bureau has misconstrued and/or misapplied Commission policy announced in Recon. Order that only a "decisionally significant", community-related preference earned in a comparative hearing would bar a permittee or licensee from filing a later petition requesting a change in that community of license?
- B. Whether, under the undisputed facts of this case, the Bureau's ruling and/or the Commission's orders in Modification of Community conflict with the superior mandate of Section 307(b) of the Communications Act.

^{1/} In Bechtel v. FCC, 10 F.3rd 875 (D.C. Cir. 1993) the Court held that the integration criterion was unlawful.

III. Argument

A. Petitioner's Local Residence and Civic Activities Were Not Decisionally Significant Factors in the Award of the Construction Permit for WDBS.

Petitioner's construction permit for WDBS was obtained after a comparative hearing in which his application received comparative preferences for local residence and limited civic activities. See Leslie E. Gradick, 7 FCC Rcd 3755 (ALJ 1992). However, said preferences were not significant factors in the ultimate decision to grant Petitioner's application. Rather, the ALJ held that "the award of 100% quantitative integration credit to [Petitioner] and the denial of all such credit to [the opposing applicant] is the determinative factor in this case." 7 FCC Rcd at 3757, ¶ 26.

In the Recon. Order, the Commission said that where a petitioner seeking a change in community had acquired its license or permit in a comparative hearing, it would review the hearing proceeding to determine whether the Petitioner had received "a decisionally significant preference" that would not have been granted had the comparative contest been for a station at the new community. 5 FCC Rcd at 7097 (emphasis added). As pointed out above, in awarding the permit to Petitioner, the ALJ clearly ruled that the "decisionally significant" factor in the case was the difference between the two applicants' quantitative integration proposals. Petitioner's integration proposal was not linked to Bolingbroke, the community to which the channel is now allotted. While Petitioner lived in Bolingbroke, he would have prevailed in the hearing by proposing 100% quantitative integration of ownership into management if the comparative contest had been for a Yatesville station.^{2/}

^{2/} The two communities are approximately 20 miles apart.

While the Commission has not previously construed the meaning of "decisionally significant preference" as used in the Recon. Order, in ruling on petition for change in community of license, common usage of those words requires a ruling that the award of the WDBS construction permit to Petitioner in this case does not bar consideration of his petition. Accordingly, the Commission should review and reverse the Bureau's action. See, 47 C.F.R. §§ 1.115(b)(2)(i) and (iii).

B. Section 307(b) of the Communications Act Would be Better Served by the Allocation of Channel 271C3 to Yatesville Than the Existing Allotment to Bolingbroke

It is axiomatic that no Commission policy can stand if it violates a superior mandate of the Communications Act. The Commission implicitly recognized this principle in the Recon. Order, when it modified its ruling in Modification of Community that petitions proposing to deprive a community its only local service would not be granted, 4 FCC Rcd at 4874, ¶28. In the Recon. Order, the Commission ruled that such petitions would be granted where a petitioner demonstrated that its proposal would serve the mandate of 47 U.S.C. § 307(b) better than the existing allotment. 5 FCC Rcd at 7096-7097, ¶¶ 17-19. Petitioner respectfully submits that his proposal to allot Channel 271C3 to Yatesville, Georgia, in place of the existing allotment of Channel 271A at Bolingbroke, Georgia, will advance the Commission's mandate under 47 C.F.R. § 307(b).

First, even through Bolingbroke would lose a first local service under Petitioner's proposal, Yatesville would gain one. Thus, Petitioner's proposal would not "reduce the number of communities enjoying local service," and therefore it is not "presumptively contrary to the public interest." Recon. Order, 5 FCC Rcd at 7097, ¶18. Moreover,

Yatesville is both more of a "community" and a more independent community than Bolingbroke. Yatesville is listed in 1990 Census as an incorporated community in Upson County with a population of 409 people. It has a mayor, a city council, a police force and a fire department. See page 2 of Engineering Exhibit attached to Petition ("Eng. Ex."). In contrast, Bolingbroke is not listed in the Census and is not incorporated. According to the Rand McNally 1994 Commercial Atlas and Marketing Guide, Bolingbroke has a post office and a population of 150 people. Thus, Petitioner's proposal would advance the objectives of Section 307(b) by bringing a first local service to a larger, more important community.

Second, Petitioner's proposal would better serve Section 307(b) by providing a new service to rural areas, while the areas which would "lose" service are located in a well-served urban area. In the Recon. Order, the Commission stated that in deciding whether to grant petitions to change communities, it would consider factors such as,

the location of the proposed allotment with respect to other communities and the availability of other services in the communities affected by the proposed change. Under these circumstances it is proper for the Commission to consider whether a proposal would result in shifting of service from an underserved rural to well-served urban area and the public interest consequences of any such change. (5 FCC Rcd at 7096, ¶ 12).

An examination of such factors in this case reveals that Petitioner proposes to shift service away from the already well-served Macon, Georgia urbanized area and provide new service to rural areas which are relatively unserved by existing stations. A fortiori, the "public interest consequences" of Petitioner's proposal would enhance the objectives of Section 307(b). For example, while grant of this proposal would increase WDBS's service area by a factor of 2.58 (from 1791 to 4629 square kilometers), the new area contains some 45,000 fewer people. Eng. Ex., p. 3. Also, while the entire population which will lose

service from this proposal is currently served by at least 11 stations, portions of the population which would obtain new service are now served by as few as two existing stations (465 people) and three existing stations (2783 people). Eng. Ex., pp. 2-3 and Fig. 3. Moreover, while WDBS would serve a substantial part of the city of Macon and of Bibb County, the largest county in the Macon SMSA, with its currently authorized facilities, the instant proposal would not serve any of Macon and only a small portion of Bibb County. Eng. Ex., Fig. 3.


**IV. The Commission Must Reverse The Bureau Action and Issue
the Notice of Proposed Rulemaking Requested by Petitioner**

In the foregoing sections of this submission, Petitioner has demonstrated that the Bureau's action dismissing his petition for rulemaking conflicts with the Commission's directives described in the Recon. Order, and, more importantly, violates 47 U.S.C. § 307(b). Accordingly the Commission is respectfully requested to reverse the Bureau and issue a Notice of Proposed Rulemaking seeking comments on Petitioner's proposal to amend 47 C.F.R. § 73.202(b) by deleting Channel 271A from Bolingbroke, Georgia, and allocating Channel 271C3 to Yatesville, Georgia, for use by WDBS.

Respectfully submitted,

JOSEPH I. KENDRICK

By:



Lawrence J. Bernard, Jr.

5224 Chevy Chase Parkway, N.W.
Washington, D.C. 20015
(202) 237-8215

June 16, 1995

EXHIBIT A



Federal Communications Commission
Washington, D.C. 20554

MAY 3 1995

Lawrence J. Bernard, Jr.
5224 Chevy Chase Parkway, N.W.
Washington, D.C. 20015

Re: RM-8622

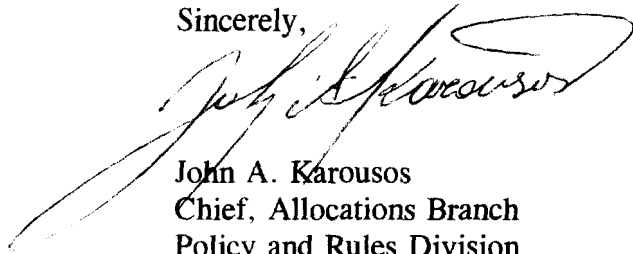
Dear Mr. Bernard:

This is in response to the petition for rule making which you submitted on behalf of Joseph J. Kendrick, permittee of Station WDBS(FM) at Bolingbroke, Georgia. You have requested the substitution of Channel 271C3 for Channel 271A at Bolingbroke, Georgia, the reallocation of Channel 271C3 from Bolingbroke, Georgia, to Yatesville, Georgia, and the modification of the construction permit for Station WDBS(FM) to specify Yatesville as its community of license.

After review of your proposal, we find it unacceptable for consideration at this time. The Commission amended its rules, in Modification of FM and TV Authorizations to Specify a New Community of License ("Modification"), MM Docket No. 88-526, 4 FCC Rcd 4870 (1989), recon. granted in part, 5 FCC Rcd 7094 (1990), which permits licensees and permittees to seek a change in their communities of license through rule making proceedings without risking the loss of their authorizations to competing applicants. In the modifications proceeding, the Commission stated that "if a situation were to arise where a licensee or permittee proposed to change its community of license, and that licensee or permittee had received in a comparative hearing a decisionally significant preference that would not have been granted had the comparative contest been for a station at the new proposed community." The Commission noted that a number of qualitative enhancements in the comparative process, such as local residence and daytimer preferences have a particular nexus with the community of license. In such cases, we will not accept petitions to change the community of license before or during the first year of station operation. Mr. Kendrick was granted a construction permit for Channel 271A at Bolingbroke as a result of prevailing in a comparative hearing in which the Administrative Law Judge awarded it, "a decisive 100% quantitative credit, enhanced by long term residence, and limited civic activities in Bolingbroke. In addition, the reallocation of Channel 271C3 from Bolingbroke to Yatesville would deprive Bolingbroke of its only local service. We find that Mr. Kendrick's proposal does not meet the Commission's requirements for a change of community, since it has not been on the air in Bolingbroke for a period of one year or more. See Modification, supra.

In view of the above your petition for rule making is unacceptable for consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Karousos". The signature is fluid and cursive, with a large loop at the end.

John A. Karousos
Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

Enclosure

EXHIBIT B

REIVED

MAR 8 1995

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the matter of)
)
Amendment of Section 73.202(b),) MM Docket No. _____
Table of Allotments) RM 8622
FM Broadcast Stations)
(Bolingbroke and Yatesville,)
Georgia))

To: Chief, Mass Media Bureau

**PETITION FOR RULEMAKING
AND MODIFICATION OF CONSTRUCTION PERMIT**

Joseph J. Kendrick ("Petitioner"), permittee of radio station WDBS (FM),
Bolingbroke, Georgia, pursuant to 47 C.F.R. §1.420(i), hereby respectfully petitions the
Commission to amend 47 C.F.R. §73.202(b), the Table of Allotments for FM Broadcast
Stations in the following manner:

<u>Community</u>	<u>Present</u>	<u>Channel No.</u>	<u>Proposed</u>
Bolingbroke	271A		---
Yatesville	---		271C3

In support whereof, the following is shown:

1. In Modification of FM and TV Authorizations to Specify a New Community of License ("Modification"), 4 FCC Rcd 4870 (1989), recon. granted in part ("Modification Recon.") 5 FCC Rcd 7094 (1990), the Commission adopted 47 C.F.R. §1.420(i) to permit FM and TV stations to seek changes in their communities of license through rulemaking without subjecting themselves to the risks of losing their authorizations to competing

applicants. The Commission emphasized that petitioners seeking such changes would be required to demonstrate that their proposals would result in "a net service benefit"; i.e. "a preferential arrangement of allotments." Modification 4 FCC Rcd at 4873, ¶ 25. In particular, the Commission stated that it would not grant such petitions "if the effect would be to deprive a community of an existing service representing its only local transmission service." Id. at 4874, ¶ 28. However, in Modification Recon., the Commission stated that waivers of the prohibition against removal of a community's only local service would be granted in limited cases where a petitioner could demonstrate that its proposal would better serve the mandate of 47 U.S.C. §307(b) than an existing allotment. Petitioner submits that the allocation of Channel 271C3 to Yatesville will better serve the public interest than the existing allotment of Channel 271A to Bolingbroke.

2. Yatesville v. Bolingbroke. Channel 271A was allotted to Bolingbroke to bring that community its first transmission service. See Bolingbroke, Unadilla and Warner Robbins, GA, 5 FCC Rcd 1603 (1990). Yatesville does not now have a local transmission service. However, Yatesville is both more of a "community" and a more independent community than Bolingbroke. Yatesville is listed in 1990 Census as an incorporated community in Upson County with a population of 409 people. It has a mayor, a city counsel, a police force and a fire department. See Attached Engineer Exhibit, p. 2. In contrast, Bolingbroke is not listed in the Census and is not incorporated. According to the Rand McNally 1994 Commercial Atlas and Marketing Guide, Bolingbroke has a post office and a population of 150 people.

3. Service to Rural vs. Urban Areas. In Modification Recon., the Commission addressed the concern that the new rule would result in the migration of stations from rural to urban areas, contrary to the intent of Section 307(b). The Commission stated that when presented with conflicting options of retaining existing allotments or adopting new ones, it will choose the option which best discharges the statutory intent of Section 307(b), 5 FCC Rcd. 7096, ¶ 12, and will consider factors such as

. . . the location of the proposed allotment with respect to other communities and the availability of other services in the communities affected by the proposed change. Under these circumstances it is proper for the Commission to consider whether a proposal would result in shifting of service from an underserved rural to a well-served urban area and the public interest consequences of any such change. (5 FCC Rcd at 7096, ¶ 12).

4. The instant proposal presents the Commission with the precise opposite of the rural-urban area migration discussed above. Petitioner proposes to move his station away from the well-served Macon urbanized area, and provide new service to rural areas which are relatively unserved by existing stations. Thus, while grant of this proposal would increase his station's service area by a factor of 2.58 (from 1791 to 4629 square kilometers), the new area contains some 45,000 fewer people. Eng. Ex., p. 3. Also, while the entire area which will lose service from this proposal is currently served by at least 11 stations, portions of the population and area which would obtain new service from this proposal are now served by as few as two existing stations (465 people) and three existing stations (2783 people). Eng. Ex., pp. 2-3 and Fig. 3. Moreover, while WDBS would serve a substantial part of the city of Macon and of Bibb County, the largest county in the Macon SMSA, with its currently authorized facilities, the instant proposal would not serve any of Macon and only a small portion of Bibb County. Eng. Ex., Fig. 3.

5. Efficient Use of the Frequency. Petitioner proposes an upgrade in Channel 271 from Class A to Class C3 status, and, as mentioned above, much of the area which will receive service from the proposal now receives relatively few services from existing stations.

6. Petitioner's Permit was Awarded in a Comparative Hearing. The permit for WDBS was awarded to Petitioner in a comparative hearing. Leslie E. Gradick, 7 FCC Rcd 3755 (ALJ 1992). In Modification Recon., the Commission stated it would review such grants to determine whether to accept petitions to change communities of license in order to determine whether the petitioner had received "a decisionally significant preference that would not have been granted had the comparative contest been for a station at the new community." 5 FCC Rcd at 7097. While Petitioner did receive a qualitative enhancement to his integration proposal for his local residence in Bolingbroke in the hearing, this preference was not "decisionally significant." Petitioner won the case because the quantitative integration proposal of his only opponent was rejected. 7 FCC Rcd at 3757, ¶ 26 ("The award of 100% quantitative integration credit to Kendrick and the denial of all such credit to Gradick is the determinative factor in this case").¹ Therefor, the fact that Petitioner acquired his permit in a comparative hearing does not adversely affect his eligibility to request the changes described herein.

7. Conclusion. The foregoing paragraphs demonstrate that Petitioner's proposal to remove Channel 271A from Bolingbroke and allot Channel 271C3 to Yatesville will provide the effected area with a fairer, more efficient and more equitable distribution of

¹ The Commission no longer uses integration of ownership into management as a criterion in deciding comparative cases.

channel allotments. Accordingly, Petitioner respectfully requests that his proposal be adopted and that his permit for WDBS be modified to specify operation on Channel 271C3 at Yatesville. Petitioner represents that if his proposals are adopted, he will immediately proceed to file an application to modify his permit to show the exact facilities he plans to construct and, upon approval of those facilities by the Commission, he will immediately construct them.

Respectfully submitted,

JOSEPH I. KENDRICK

By:

A handwritten signature in cursive script, appearing to read "Lawrence J. Bernard, Jr.", written over a horizontal line.

Lawrence J. Bernard, Jr.
5224 Chevy Chase Parkway, N.W.
Washington, D.C. 20015
(202) 237-8215

March 8, 1995

JOSEPH I. KENDRICK
YATESVILLE, GEORGIA
ENGINEERING EXHIBIT

February 1995

William Culpepper & Associates, Inc.
900 Jefferson Drive
Charlotte, NC 28270

JOSEPH I. KENDRICK
YATESVILLE, GEORGIA
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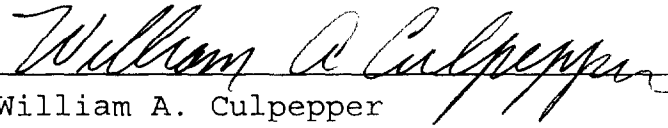
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JOSEPH I. KENDRICK
YATESVILLE, GEORGIA

DECLARATION

I declare, under penalty of perjury, that I have prepared the attached Engineering Exhibit for Joseph I. Kendrick, permittee of radio station WDBS, and that all of the facts therein, except for facts of which the Federal Communications Commission may take official notice, are true to the best of my knowledge and belief; and that I am a Registered Professional Engineer in the State of Georgia.

Executed on February 27, 1995.


William A. Culpepper

William Culpepper & Associates, Inc.
900 Jefferson Drive
Charlotte, NC 28270
704-365-9995

JOSEPH I. KENDRICK

BOLINGBROKE, GEORGIA

NARRATIVE

This exhibit supports the attached petition of Joseph I. Kendrick, permittee of WDBS, channel 271A, Bolingbroke, Georgia. The purpose of the petition is to modify the FM Table of Allotments to reassign channel 271 from Bolingbroke to Yatesville, Georgia, to change the class from A to C3, and to modify the authorization of WDBS accordingly.

Yatesville is an incorporated town in Upson County, Georgia with a 1990 population of 409. It has a mayor, a city council, a police force, and a volunteer fire department. Implementation of this petition would provide Yatesville with a first local radio service.

A tabulation of distances from a reference point to existing facilities, authorizations, applications and known rule making petitions on channel 271 and the first, second, third, fifty-third and fifty-fourth adjacent channels is included in this exhibit. The reference point is 32° 49' 40" north and 84° 14' 35" west. This reference meets the requirements of §73.207, and a class C3 facility there can easily meet the requirements of §73.315 regarding minimum signal strength over the principal community.

The area meeting the requirements of §73.207 and §73.315 is large enough to provide reasonable assurance that a suitable transmitter site will be available if this petition is granted.

Figure 1 shows the 60 dBu contours for the present facility and for a C3 facility located at the reference coordinates. The figure shows the 60 dBu contours of FM stations WAYS, WDEN, and WPEZ, all Macon; WQBZ, Fort Valley, and WMGB, Jeffersonville. The figure also shows the 0.5 mV/m contours of AM stations WBML, WMAZ, WDDO, WKXK, WNEX, and WDEN, all licensed to Macon. The loss area that would be created by implementation of this proposal is identified, and it is clear that this loss area receives service from five FM stations and six AM stations. (AM station WDDO covers approximately 98 per cent of the loss area.)

The authorized and proposed service contours are shown on a county map on Figure 2. The areas and populations of the authorized facility and of a class C3 facility operating at the reference coordinates are as follows:

NARRATIVE... (continued)

	AREA	POPULATION (1990 DATA)
AUTHORIZED	1791 km ²	120,533
PROPOSED	4629 km ²	75,216
OVERLAP	912 km ²	11,205
LOSS	879 km ²	109,764
GAIN	3717 km ² (207.5%)	64,011 (53.1%)

The authorized and proposed areas were calculated from the distances to contours, using 5 degree increments. The overlap area was determined by planimeter. Population was determined by a computer program which adds the populations of census districts with centroids within the 60 dBu contour. Population in the overlap area was determined by matching the centroids that occurred in both the authorized and proposed 60 dBu contours.

A class C3 facility operating at the reference coordinates would provide a third broadcast service to 465 people and a fourth service to 2783 people. The areas are shown on the census map of Figure 3. Facilities shown on the map are identified on page 5.

All contours used in the Additional Services Map were calculated at one degree intervals using licensed or authorized facilities. The proposed contour was calculated using a maximum class C3 facility at the reference coordinates. Populations were determined from 1990 census data by using a planimeter and assuming uniform distribution of population. The numbers were derived in the prescribed manner as follows:

Third Service		<u>POPULATION</u>
Taylor County	Butler Division	434
	Rupert Division	23
Macon County	Ideal Division	<u>8</u>
Total third service		465
Fourth Service		
Taylor County	Butler Division	230
	Butler Town	1520
	Carsonville-Panhandle Division	68
	Rupert Division	315
Marion County	N. Buena Vista Division	<u>650</u>
Total Fourth Service		2783

NARRATIVE... (continued)

The spacing requirements for channel 271C3 cannot be met while meeting the city-grade signal requirement for Bolingbroke. Grant of this petition will permit the increased coverage area, and additional service as shown above; it will not create any underserved area, and it will provide a first local broadcast service to the town of Yatesville. The subject of removing service from Bolingbroke is discussed elsewhere in this petition.

If this petition is granted, petitioner will file an application for construction permit promptly, and when granted, will construct the facility in an expeditious manner.

WILLIAM CULPEPPER & ASSOCIATES
900 JEFFERSON DR - CHARLOTTE NC 28270

JOSEPH I. KENDRICK
YATESVILLE, GEORGIA

REFERENCE		CLASS C3	DISPLAY DATES
32 49 40 N			DATA 01-27-95
84 14 35 W	Current rules spacings		SEARCH 02-25-95
----- CHANNEL 271 -102.1 MHz -----			

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN	
WDBS.C	271A	Bolingbroke	GA	72.2	32.19	142.0	-109.81	*
WGMG.A	271C3	Crawford	GA	37.6	153.23	153.0	0.23	<
WELRFM	272C3	Roanoke	AL	283.2	105.14	99.0	6.14	
WWSG.C	271A	Sylvester	GA	165.3	148.98	142.0	6.98	
WKZR	272A	Milledgeville	GA	73.1	97.03	89.0	8.03	
WGMG	271A	Crawford	GA	37.6	153.23	142.0	11.23	
WKHXFM	268C	Marietta	GA	355.2	109.04	96.0	13.04	
WHHYFM	270C	Montgomery	AL	255.6	189.32	176.0	13.32	
WJTGFM	217C1	Fort Valley	GA	113.1	38.75	24.0	14.75	
ALOPEN	271C3	Crawford	GA	43.0	170.65	153.0	17.65	
WRCCFM	269A	Warner Robins	GA	110.4	60.07	42.0	18.07	
WRCCFM	269A	Warner Robins	GA	110.4	60.07	42.0	18.07	
WYIQ.C	273A	Warner Robins	GA	117.8	60.72	42.0	18.72	
WJFL.C	270A	Tennille	GA	85.7	127.45	89.0	38.45	
WZAT	271C	Savannah	GA	107.4	286.11	237.0	49.11	

JOSEPH I. KENDRICK
YATESVILLE, GEORGIA
IDENTIFICATION OF STATIONS SHOWN ON THE MAP
OF UNDERSERVED AREAS

FM STATIONS

223A	Zebulon, GA	WEKS
227C	Manchester, GA,	WVFJ-FM
237A	Thomaston, GA,	WTGA-FM
239C3	Greenville, GA,	WKZJ
249A	Griffin, GA	WQUL
253C	Atlanta, GA	WSB-FM
256C1	Macon, GA	WAYS
257C2	Lumpkin, GA	WKCJ
260A	Unadilla, GA	WAFI (CP)
266A	Thomaston, GA	WTGA-FM
275C	Columbus, GA	WVRK
277C	Atlanta, GA	WVEE
287C1	Macon, GA	WDEN-FM
292C2	Fort Valley, GA	WQBZ
297C	Columbus, GA	WCGQ
300C1	Macon, GA	WPEZ

AM STATIONS

750 kHz Atlanta, GA WSB (AM)

Note: WSB-FM and WVEE diplex into the same antenna.

AM CONTOURS = 0.5 mV/m (DASH)
 FM CONTOURS = 1 mV/m (SOLID)

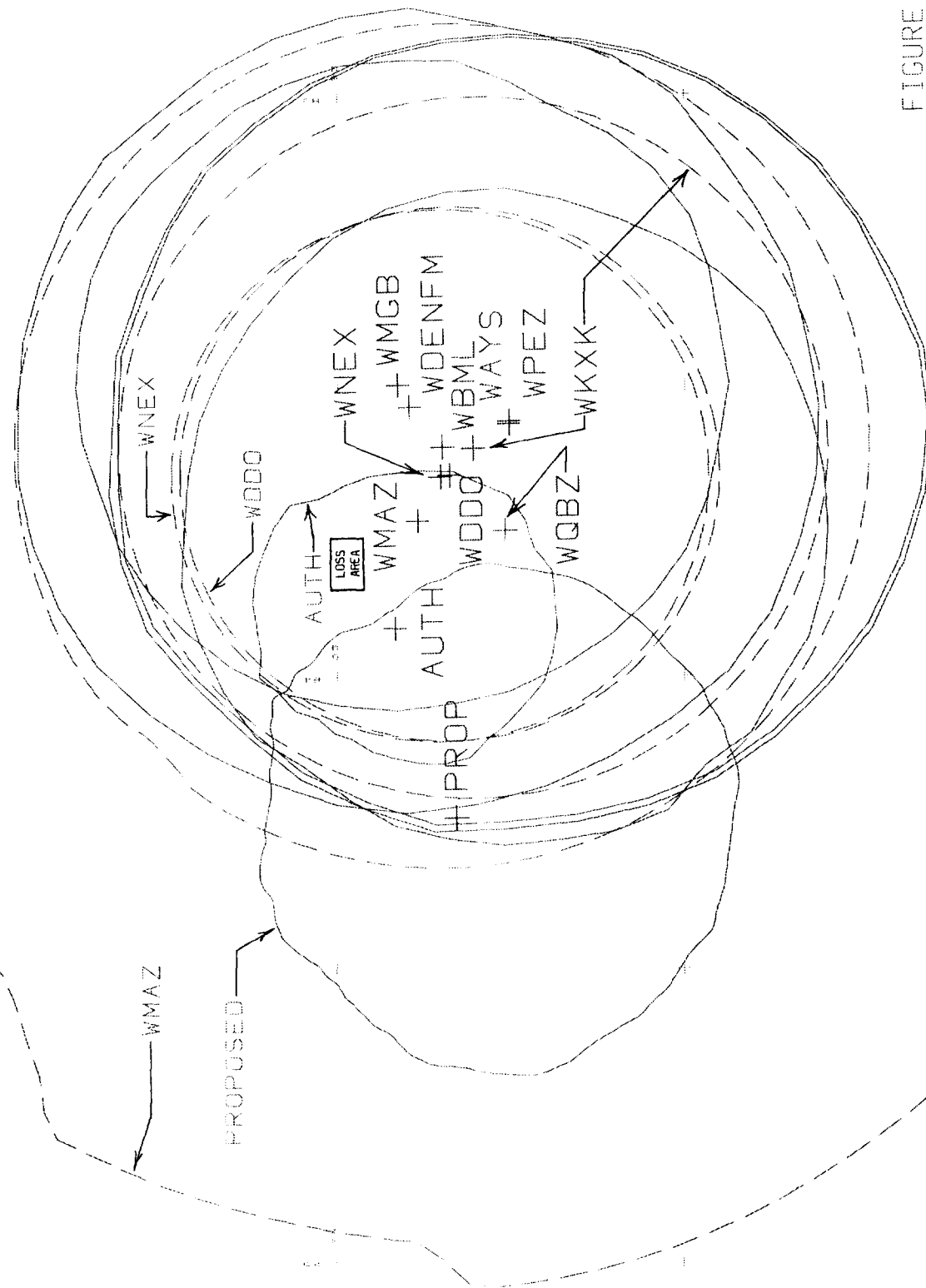


FIGURE 1

Scale in km
 0 10 20 30 40 50 60 70

AUTHORIZED AND PROPOSED 60 dBu CONTOURS
 AND SERVICE CONTOURS OF OTHER STATIONS

JOSEPH I. KENDRICK
 YATESVILLE, GA

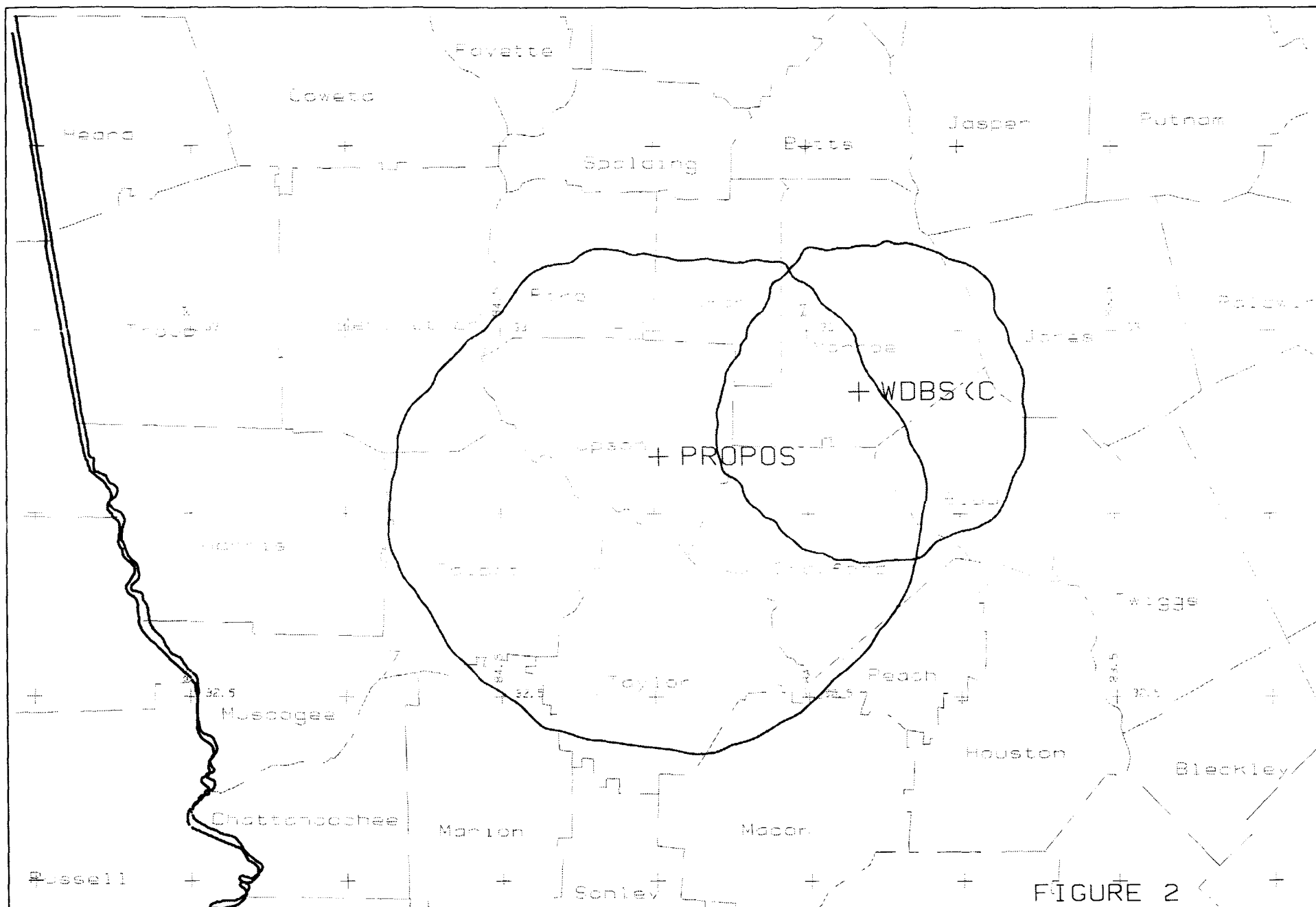


FIGURE 2

THE AUTHORIZED 60 dBu CONTOUR OF WDBS
AND THE 60 dBu CONTOUR AS PROPOSED

JOSEPH I. KENDRICK
YATESVILLE, GEORGIA